

DOCKET NO.: IVGP-0002  
Application No.: 09/810,716  
Office Action Dated: May 17, 2006

PATENT  
REPLY FILED UNDER EXPEDITED  
PROCEDURE PURSUANT TO  
37 CFR § 1.116



**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re Application of:  
**Hiang-Swee Chiang**

Application No.: **09/810,716**

Filing Date: **March 16, 2001**

For: **WEB APPLICATION GENERATOR**

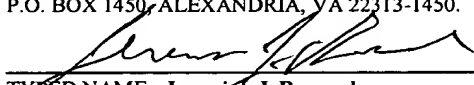
Confirmation No.: **2184**

Group Art Unit: **2193**

Examiner: **William H. Wood**

DATE OF DEPOSIT: **June 30, 2006**

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Sir:

**PRE-APPEAL BRIEF REQUEST FOR REVIEW**

Applicants respectfully request review of the final rejection in the above-identified application. No amendments are being filed with this request. This request is being filed with a Notice of Appeal. The review is requested for the reasons stated on the attached sheets. No more than five pages are provided.

### REMARKS – REASON FOR REVIEW

Claims 2, 4-29, 31-50, 52-64, 66-78, and 162-169 are pending in the present application, with claims 2, 27, 48, 64, 78, 162, 163, 164, 165, and 166 being the independent claims.

Claims 2, 4-13, 15, 18-20, 22-29, 31-37, 39, 42-50, 52-, 57, 59, 63, 64, 66-70, 72, 75-78 and 162-169 are rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over Lau (USPN 5,987,247) in view of Lindhorst et al. (USPN 6,337,696) in further view of Quaeler-Bock et al. (USPN 6,023,271).

Claims 14, 16-17, 21, 38, 40-41, 58, 60-62, 71 and 73-74 are rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over Lau (USPN 5,987,247) in view of Lindhorst et al. (USPN 6,337,696) in view of Quaeler-Bock et al. (USPN 6,023,271) and in further view of alleged APA (Applicant Admitted Prior Art).

Review of the outstanding rejections to the claims is respectfully requested in view of the following remarks.

#### *Claim rejections under 35 U.S.C. §103*

Regarding independent claim 2, The Office Action contends that Lindhorst describes “determining an event handler method based on one or more of the tag type, the attribute name and the attribute value.” Although Lindhorst describes parsing an input file (Col. 11, lines 41-44) and searching through the parsed document to send the separated object text, script text and HTML text from the parsed document into separate memory storage (col. 12, lines 61-64), Lindhorst does not describe “determining an event handler method based on the tag type, the attribute name and the attribute value.” In Lindhorst the user links an event to a property using the graphical user interface (GUI) described in Lindhorst (see Fig. 1). This linking determination is not based on a tag type, attribute name or attribute value of an object. In fact, Lindhorst describes “when linking an event to a property, the user is attempting to use the event’s trigger to change a property of the object.” (Col. 17, lines 33-34). Applicants submit that changing a property of an object is different than determining an event handler method “based upon” a tag or any attribute (i.e., property) of the object.

Also, referring to Table 2 of Lindhorst (column 13, lines 30-65), the Office Action points out that the table shows "events" and "methods" related to specific "HTML tags" and

contends that the user described in Lindhorst performs a linking that is "based on" certain tags having certain/appropriate events and methods. Applicants respectfully disagree. In fact, Lindhorst gives an example in Table 2 of HTML tags and associated events and methods, but Lindhorst does not describe providing the HTML tags to the user for linking up the events and methods in the GUI (see Fig. 1). In Col. 13, lines 22-26, Lindhorst states "The HTML memory storage 220 also outputs events to the event pane 12 corresponding to events that are associated with scriptable HTML tags." The events (but not the associated HTML tags or tag types) are provided to the user in the event pane of the GUI (See Fig. 1). Therefore, in Lindhorst, the user determining the event handler method is not based on the tag type, but on the event itself.

Since all the limitations of claim 2 are not taught or suggested by the individual references cited in the rejections by the Office Action, or any combination thereof, for at least the reasons presented above, withdrawal of the rejections and allowance of claim 2 is earnestly solicited.

Claims 4-29, 31-50, 52-64, 66-78, and 162-169 either depend directly or indirectly from claim 2 or were rejected under the same rationale. Thus, Applicants submit that all the limitations of these claims as amended are not taught or suggested by the individual references cited in the rejections by the Office Action, or any combination thereof, for at least the same reasons presented above. Therefore, Applicants submit that claims 4-29, 31-50, 52-64, 66-78, and 162-169 of the application are in condition for allowance and withdrawal of the rejections is earnestly solicited.

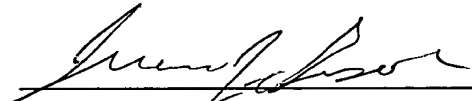
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### **CONCLUSION**

Applicants believe that the remarks above are responsive to each point raised by the Examiner in the Office Action and Applicants submit that claims 2, 4-29, 31-50, 52-64, 66-78, and 162-169 of the application are in condition for allowance. Should the Examiner have any questions, comments, or suggestions that would expedite the prosecution of the present case to allowance, Applicants' undersigned representative would very much appreciate a telephone conference to discuss these issues.

Date: June 30, 2006

  
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